

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

JOHN DOES 1 THROUGH 7,

*Judgment Creditors,*

v.

THE TALIBAN, AL-QAEDA,  
and THE HAQQANI NETWORK,

*Judgment Debtors,*

and

THE FEDERAL RESERVE BANK OF  
NEW YORK,

*Garnishee.*

Case No. 1:03-md-01570-GBD-SN

Misc Action No. 1:20-mc-00740-GBD

**CERTIFICATE OF SERVICE**

I, Orlando do Campo, hereby certify as follows:

1. This certificate of service and the attached exhibits document steps taken to serve the Doe Creditors' turnover motion papers (DEs 79, 80, 81, and 82) on the Taliban and Da Afghanistan Bank.
2. On April 5, 2022, Magistrate Judge Sarah Netburn issued an Opinion and Order (hereinafter "the Order") authorizing and directing alternative and supplemental service of the Doe Creditors' turnover motion papers on the Taliban and Da Afghanistan Bank. DE 99.
3. The Order authorized service on the Taliban via publication in the New York Times and Al-Quds Al-Arabi pursuant to N.Y.C.P.L.R. § 316, as well as service via Twitter to the accounts reported to belong to Taliban spokespersons. *Id.* at 9.

4. The Order authorized service on Da Afghanistan Bank via publication in the same newspapers, email to [info@dab.gov.af](mailto:info@dab.gov.af); and Twitter communication to @AFGCentralbank. *Id.* at 14.

5. To facilitate service by publication and other means, the Order authorized the Havlish and Doe Creditors, “[a]s an alternative to publishing the full motion papers,” to include in their published notice “an electronic address such as a URL or a QR code that directs the reader to easily accessible online versions of those papers.” *Id.* at 9. To that end, the Havlish and Doe Creditors’ launched of a public website—[www.DABturnover.com](http://www.DABturnover.com)—containing links to PDFs of the Havlish Creditors’ and Doe Creditors’ turnover motion papers in both English and Pashto, as well as an English and Pashto notice describing the relief sought in the motions. *See* Exhibit A.

6. On April 20, 2021, the Doe Creditors effected e-mail and Twitter service on Da Afghanistan Bank in accordance with the Order. *See* Exhibit B.

7. On April 20, 2021, the Doe Creditors effected Twitter service at the following Twitter accounts in accordance with the Order: @Zabehulah\_M33, @leaoffice, @QyAhmadi21, and @suhailshaheen1 on March 31, 2022. *See* Exhibit C.

8. According to Twitter, @Zabehulah\_M33 is the official Twitter account of the spokesman of the Islamic Emirate of Afghanistan, Zabiullah Mujahid. *See* Exhibit B. Zabiullah Mujahid is a senior Taliban official who previously served as the spokesman for the Taliban. Mujahid reported on Taliban activity in central, eastern, and northern Afghanistan. Following the Taliban’s takeover of Afghanistan in August 2021, on September 7, it was announced that Mujahid will serve as the deputy minister of information and broadcasting of the Taliban’s “government” in Afghanistan.<sup>1</sup>

9. The account @leaoffice is the official Twitter account for the spokesman of the political office of the Islamic Emirate of Afghanistan, Dr. Mohammad Naeem Wardak. *See* Exhibit C. Dr. Mohammad Naeem Wardak is the current Taliban “government’s” spokesperson in the Qatar office. He has served the Taliban in Qatar since 2013, when the Taliban’s first political office opened there and has been in charge of strategic and foreign relations.<sup>2</sup>

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<sup>1</sup> *See* <https://www.counterextremism.com/extremists/zabiullah-mujahid>

<sup>2</sup> *See* [http://www.afghan-bios.info/index.php?option=com\\_afghanbios&id=2874&task=view&total=581&start=557&Itemid=2](http://www.afghan-bios.info/index.php?option=com_afghanbios&id=2874&task=view&total=581&start=557&Itemid=2)

10. The account @QyAhmadi21 is the official Twitter account of the spokesman of the Islamic Emirate of Afghanistan, Qari Yousaf Ahmadi. *See* Exhibit D. Qari Yousaf Ahmadi is one of two Taliban “government” spokesmen, the other being Zabiullah Mujahid. Qari Yousaf Ahmadi has been a spokesperson for the Taliban since 2006, when he reached out to different news outlets to offer Taliban messages about Afghanistan.<sup>3</sup>

11. The account @suhailshaheen1 is the official twitter account of the Islamic Emirate of Afghanistan’s permanent representative designated to the United Nations, Suhail Shaheen. *See* Exhibit E. Suhail Shaheen is currently the Taliban “government’s” permanent representative-designee to the United Nations. Prior to this post, Shaheen was the Taliban’s second Secretary and Deputy Ambassador of the Afghanistan embassy in Pakistan. He was also the Taliban’s Doha/Qatar official political spokesperson.<sup>4</sup>

12. Service of the Doe Creditors’ motion papers by publication in the New York Times and Al-Quds Al-Arabi is currently being arranged, and the Doe Creditors will file additional proofs of service when such service by publication has been completed in compliance with the Order.

Dated: April 25, 2022

Respectfully submitted,

**do Campo & Thornton, P.A.**  
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s/ Orlando do Campo

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<sup>3</sup> See <https://www.france24.com/en/video/20210902-cyril-payen-interviews-taliban-spokesman-qari-yusuf-ahmadi>; *see also*, <https://www.nbcnews.com/id/wbna12909608>, [http://news.bbc.co.uk/2/hi/south\\_asia/5349330.stm](http://news.bbc.co.uk/2/hi/south_asia/5349330.stm).

<sup>4</sup> See [http://www.afghan-bios.info/index.php?option=com\\_afghanbios&id=2464&task=view&total=22&start=14&Itemid=2](http://www.afghan-bios.info/index.php?option=com_afghanbios&id=2464&task=view&total=22&start=14&Itemid=2)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 25, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

s/ Orlando do Campo  
Orlando do Campo